

23 Q. Oh, that is the FOC?

24 A. Uhm-hum.

25 Q. So that is then generated through the CLEO
0094
1 system?

2 A. Yes.

3 Q. Am I correct, CLEO is a part of Cesar?

4 A. Yes.

5 Q. How do you distinguish the two?

6 A. Cesar is the industry marketing system that is
7 used for the access side, and it has a menu when we go
8 into Cesar of options that the service rep can go to. One
9 of those options will take them to the access side or the
10 ICSC, are you familiar with that; industry marketing
11 handles access orders for carriers.

12 Another option on the menu is to go to CLEO,
13 which is a subsystem of Cesar, that was specifically
14 designed for resale to do various similar functions, like
15 FOC, which is done in resale as well as in the access
16 side.

17 Q. Do you know who designed the CLEO system, was
18 that Greg Torretta's group?

19 A. Yes.

20 Q. Did you work on that back when you were -- in
21 that July to December time frame?

22 A. No.

23 Q. When did you first work with CLEO?

24 A. I did not personally work with CLEO.

2 A. The four managers that I named earlier.

3 Q. And those are the four managers who supervise
4 all the service reps?

5 A. No.

6 Q. Who do they supervise?

7 A. They supervise a variety of titles of people
8 within the LISC.

9 Q. Some service reps, some order writers?

10 A. Yes.

11 Q. Others?

12 A. Yes.

13 Q. Some of the people, under your indirect chain of
14 command, work as the service reps who do the work with
15 SORD and CLEO that you discussed?

16 A. A few of them, yes.

17 Q. So if only a few of them do that, what do the
18 rest of them do?

19 A. I have a group that works customer care, which
20 is the incoming 800 number to the LISC. I have another
21 group that processes the CSR's, and another group that's
22 referred to as the mini-NAC, N-A-C, which is Number
23 Assignment Center.

24 MR. McDONALD: Do you want to take a short
25 break?

0097

1 MR. KOLTO-WININGER: That would be good, yeah.

2 Thanks.

3 (Recess taken.)

4 MR. McDONALD: Q. I understand, Ms. Long, you
5 want to clarify some assumptions that need to be made with
6 respect to the hypothetical customer that we have given
7 you?

8 A. Yes. Because this was a hypothetical situation,
9 that's how I answered the question. The only
10 clarification I wanted to make is, it is my belief that
11 not all CLCs have been able to pass via NDM complex orders
12 and orders that have hunting like this example.

13 Q. So it's your understanding that some CLCs can
14 transmit, via NDM, such orders?

15 A. Yes, they can transmit.

16 Q. Those types of orders?

17 A. Yes.

18 Q. For purposes of the questioning, we are assuming
19 that this is coming from the CLC that's capable of
20 transmitting via NDM, this type of work?

21 A. Correct.

22 Q. And it's your understanding that currently, at
23 least some CLCs are capable of transmitting an order to
24 migrate a customer such as this hypothetical one; is that
25 right?

0098

1 A. Correct.

2 Q. I think we got up to the point where the service
3 representative has, in the SORD database, entered some
4 information and then switches over to the CLEO database
5 and enters into that additional information, and then a

6 FOC is created; is that right?

7 A. That is the FOC, CLEO.

8 Q. What is contained in the FOC, what information
9 is shown on the FOC?

10 A. The order number, the due date, the PON number,
11 the ICID, the OCN, and other pertinent CLC information.

12 Q. And then that is transmitted – explain to me
13 what happens next. So that the service rep puts that
14 information into the CLEO system, right?

15 A. Correct.

16 Q. What happens next? That information that has
17 just been put on the screen, what's the next step?

18 A. They put a command on to the screen that allows
19 them to enter that information directly into CLEO. Now
20 it's not only on the screen, it's in CLEO. And once it's
21 in CLEO, then it sits and waits for the next feed, that
22 has been established with each CLC, and that FOC, then,
23 will ride the next feed to the CLC and deliver that FOC
24 information.

25 Q. And do you know with what frequency that type of
0099
1 information is transmitted to the CLC?

2 A. It depends upon what the CLC has negotiated with
3 us, as far as the frequency of feeds back to them.

4 Q. Do you know what the range – some get it every
5 hour, once a day, do you know what the range of frequency
6 is?

7 A. The range, to the best of my knowledge, has gone

8 anywhere from twice a day to every hour, between the hours
9 of 8:00 a.m. and 5:00 p.m., Pacific Standard Time.

10 Q. Do you know any reason why this -- is this
11 called like a batching of data and then a transmission; is
12 that terminology that you are familiar with?

13 A. Yes.

14 Q. Does that fairly describe what's going on?

15 A. Yes.

16 Q. Is there any reason, to your knowledge, why
17 information could not be batched after 5:00 p.m., a batch
18 entrance made, sorry?

19 A. It can be batched. It can only be transmitted
20 if we have negotiated a transmittal time with the CLC.

21 Q. Do you know whether any CLC has offered to be
22 available to receive transmissions after 5:00 p.m.?

23 A. Yes.

24 Q. And what do you know about that? Has one or
25 more CLCs offered to be available to receive transmissions
0100
1 after 5:00?

2 A. Yes.

3 Q. And has Pacific ever transmitted data after 5:00
4 p.m.?

5 A. Yes.

6 Q. Is Pacific currently in a process where that is
7 regularly done?

8 A. Yes.

9 Q. Now, you mentioned in addition that -- let me

12 billing change. Upon the third day, when that order is
13 due and once it is completed, we will go back to that
14 order, go back to that package, and we will follow up the
15 date.

16 After the due date, we will go in and retrieve
17 the service order, and go back into CLEO and pull up a
18 completion screen, and manually transfer the 10-line
19 information, the hunting information, and the call
20 forwarding information, along with any other information
21 that came -- comes on the order over on to the completion
22 screen, item by item.

23 And we will follow the same process for sending
24 that through to the CLEO system, so that it can then get
25 on a batch and wait for the next feed to go out to the
0102
1 CLC. We, also in that process, will go in and update the
2 listings Gateway with the listing provided.

3 This is, again, a hypothetical scenario, and the
4 listing on this particular order came over as migrate as
5 is, no change to the listing. We will put an indicator on
6 the outgoing service order so that that listing will not
7 be changed. It will just remain exactly the same, and
8 when we do that, we don't need to input it into the
9 Gateway.

10 If it comes over as specified, in other words,
11 CLC wants a change in the listing, then we would follow
12 that same process through SORD and the FOC and the
13 completion, but we would go into the listings Gateway and

14 make that change.

15 Q. I'd like to maybe spend a little bit of time

16 talking about provisioning steps that we talked about

17 before. After the FOC has been issued, you talked about

18 the data going through a variety of systems in order to, I

19 think, effectuate the migration; is that right?

20 A. Yes.

21 Q. Can you describe, given this hypothetical

22 customer end user, sorry, what would happen, what are the

23 systems that you're aware of that would receive

24 information, what the processes that would be used to

25 effectuate the migration?

0103

1 A. Well, as I stated earlier, there are orders that

2 are placed against this particular scenario that would

3 remove that end user out of the CRIS billing system, which

4 is how Pacific Bell will bill our end user customer. And

5 these orders will take care of removing that customer

6 through CRIS and put him into the CABS billing system,

7 which is the billing system we use to bill all of the

8 CLCs.

9 And when the service rep sends that SORD order

10 through the system, I had mentioned that those SORD orders

11 will download and go downstream into several other

12 provisioning systems, of which I am not real familiar with

13 the systems, I only know them by name. And each system

14 plays a very active part in making sure that that order

15 flows through, and that the purpose of this exercise is

16 completed on the date of completion.

17 Q. What's the source of the information that's used

18 for this provisioning, is it the data from SORD or is it

19 the data from CLEO?

20 A. SORD.

21 Q. So the information that the service rep has

22 keyed into the SORD screen is transferred at some point

23 into other systems?

24 A. Yes.

25 Q. What causes that transfer to occur?

0104

1 A. Once the service rep completes the orders and

2 they enter the orders into the SORD system, so now they

3 are no longer on the screen in front of the rep, they have

4 actually sent the orders or hit the "send" button on their

5 terminal.

6 Q. Does that occur before or after the creation of

7 the FOC?

8 A. Before.

9 Q. So after they have completed the entry of the

10 SORD screen, they hit send, it will send that information

11 on its way to the other provisioning systems; is that

12 right?

13 A. Yes.

14 Q. And then the service rep goes back to CLEO and

15 does the FOC data?

16 A. Yes.

17 Q. Are there sequence of systems that this order

that I am aware of?

sequentially flow through a lot of

already mentioned one of them is the

S system; is that right?

f that's the first event, first

v.

ie sequence of events, what systems

rk knows best what that sequence

jalupi.

-p, as in Paul, i.

r from service operations at

e industry markets group?

he within?

ns.

te stand-alone division?

with Greg Torretta?

22 that is being migrated over. We also issue the D order

23 that will take everything out of CRIS system.

24 Q. So when the service representative is at the

25 keyboard, SORD template, having entered all that
0107

1 information and about to send it away, has the service

2 representative entered that D order that you mentioned at

3 that point?

4 A. No.

5 Q. When does that occur?

6 A. The C order could occur first or the D order

7 could occur first. It doesn't matter, the sequence in

8 which they issue the orders. What does matter is that

9 neither order is issued unless they have an indicator on

10 the orders that relates each order to one another.

11 Q. I am trying to sort of find out the system.

12 When is that order, that C order – is that a connect

13 order?

14 A. Yes, yes.

15 Q. So you have got a C and a D order that the

16 service representative will type in; is that right?

17 A. Yes.

18 Q. When is that order entered in the sequence? As

19 I had understood it, the service representative gets the

20 package, goes into a SORD screen, makes some entries,

21 sends it on its way, and then goes into the CLEO screen.

22 And I think I missed something. Where, in that sequence

23 of events, has the service representative submitted the C

24 and D orders?

25 A. Prior to going into the FOC screen.

0108

1 Q. Do they enter other orders besides the C and D

2 that you mentioned?

3 A. No.

4 Q. So do they do anything -- for example, I think,

5 in the hypothetical, you had hunt groups. Is there

6 something special done by the service representative to

7 address that feature?

8 A. I am not sure I understand what you mean by

9 something special.

10 Q. Is there anything else that the service

11 representative does besides entering the data on the SORD

12 screen and then this C and D order? Is there anything

13 else to accomplish, and then hit the send button? I

14 guess, is there anything else that they need to do to

15 effectuate the provisioning of this migration through the

16 existing Pacific Bell systems?

17 A. No.

18 Q. So there is a -- if we are describing it, this

19 is the system that's currently in place; is that right?

20 A. That's correct.

21 Q. That system, system in -- so these are the

22 systems and processes that are occurring; is that right?

23 A. Yes.

24 Q. It's true, isn't it, that at least some of the

25 processes have changed since September of 1996; is that

0109

1 correct?

2 A. Yes.

3 Q. Have any of the systems changed as well, since
4 then?

5 A. Changed in what way?

6 Q. You tell me, are they different?

7 A. No, I wouldn't say that they are different.

8 Q. So the SORD system, the CLEO system, the entries
9 that the service representatives are making, and the
10 people in the command center, the LTD system, that's
11 substantially the same as it was last September?

12 A. Pretty much, yes.

13 Q. Do you recall, in any way, that it's changed?

14 For example, you made a reference to there is a relation
15 or some connection between the C and D order. My
16 understanding is that that wasn't always the way it was;
17 is that correct?

18 A. No, there was also a relation between the two.

19 Q. You are aware of the issue of some migrating
20 customers losing dial tone, are you not?

21 A. Yes, I am.

22 Q. And you are aware that one of the explanations,
23 at least that I am aware of, that Pacific Bell had
24 identified as the reason for those disconnects occurring,

25 was that there was a separation that could occur between
0110

1 the disconnect order and the migration order; is that

2 right?

3 A. That is correct.

4 Q. And was there not a change implemented to ensure
5 that those two orders would not become separated?

6 MR. KOLTO-WININGER: That you are aware of.

7 THE WITNESS: Not that I am aware of, no.

8 MR. McDONALD: Q. You haven't heard anybody
9 talk about that?

10 A. Not about a change, no.

11 Q. What have you heard -- have you heard any
12 discussion about efforts being made to avoid these two
13 orders being separated?

14 A. Yes, I have.

15 Q. What have you heard?

16 A. That there was additional training that took
17 place in our operations side of the house, so that when
18 they -- they had to become involved in processing these
19 orders, that they were more familiar with the order
20 because it was new and the resale order. There was also
21 additional training that took place on the retail side of
22 the house, so that service representatives who received
23 calls from end users, who were not educated by the CLCs
24 not to call Pacific Bell, would cease and desist touching
25 the resale orders, therefore affecting how they flowed
0111
1 through the system.

2 Q. So you identified there were two sort of
3 separate additional training efforts that were undertaken,
4 one dealt with service representatives on Pacific Bell's

5 retail side?

6 A. Yes.

7 Q. And they were trained to do what, not to attempt
8 to process migration orders?

9 A. Well, not to interfere with the orders as they
10 were flowing through the system. By interfere, I mean
11 when the end users would contact the retail side of the
12 house, the service representatives were cancelling, at the
13 end user request, the order, the D orders, because the end
14 users were upset that they were being moved and claiming
15 that they didn't have any knowledge of that. And so the
16 service representatives were cancelling the D orders, not
17 knowing that they were part of a resale process, that they
18 should not have been touching the orders, that they should
19 have been referring the CLC -- or the end user back to the
20 CLC to resolve their issues.

21 Q. And the first additional training effort, can
22 you describe that again? You mentioned that the retail
23 side -- there was also additional training for --

24 A. Yes.

25 Q. Service reps at the LISC, was it?
0112

1 A. No, not service representatives, but employees
2 who were in a -- what we refer to as Customer Service
3 Center, which is the CSC. That's the operation side of
4 the house. When we have sent the orders downstream
5 through the system, there is intervention required.

6 In that process, they will flow through the CSC,

7 and a customer service agent at the CSC will pull the
8 order down out of the system that kicked the order out,
9 and they will manually process it to get it back in the
10 system and on its way. So there was additional training
11 given to those individuals, simultaneously with the retail
12 service representatives.

13 Q. Was that training in connection with complaints
14 about loss of dial tone that migrating customers were
15 experiencing?

16 A. Yes.

17 Q. Can you explain what the relation -- what caused
18 the loss of dial tone to occur?

19 A. I don't know exactly what caused the loss of
20 dial tone to occur.

21 Q. How was the training going to help to avoid that
22 from occurring?

23 A. It would assist the retail service reps so they
24 would not cancel one order and not the other. And it
25 would also assist the customer service agents and the CSC,
0113

1 so that when an order did fall out of the system, that
2 they enter the correct information on that order to get it
3 back into the system, so that it would flow through
4 without interruption.

5 Q. You talked about -- these are CLC employees who
6 were trained?

7 A. No.

8 Q. Who are they, again?

9 A. Pac Bell employees.

10 Q. But you said they are customer service agents?

11 A. Yes.

12 Q. For CLCs?

13 A. No. For Pac Bell.

14 Q. Were they like troubleshooters dealing with --

15 where there were problems, they were then going into

16 orders that were in process and somehow altering them, and

17 you believe that was the source of the dial tone loss?

18 A. They were altering them because they had fallen

19 out of the system, or it could be for several different

20 systems, just like regular orders that are going through

21 retail will fall out of the provisioning system. When an

22 order falls out, then it requires manual intervention to

23 fix what's wrong on the order and to get it back into the

24 system so that it can continue to flow. They were having

25 a similar problem, in that they didn't understand why

0114

1 there were two orders, and they didn't know that if they

2 made a change on one order, they needed to make it on the

3 other.

4 Q. So then, going back to the provisioning -- the

5 steps for provisioning, the service representatives have

6 filled out the screen, made the D and C orders. Those are

7 the two orders that they enter?

8 A. Yes.

9 Q. Can you describe what it is? Do they key in

10 some kind of instructions; is there a phone number, a

11 date, something? What do they do?

12 A. On which order?

13 Q. Each one. Start with the C order, if you want.

14 A. The C order, they input the taken date, their
15 sales code that identifies them specifically, they input
16 address information, information for the end user, and in
17 this hypothetical scenario, they would enter the number of
18 lines, the hunting associated to the lines and any
19 features like call forwarding. And that would be on the C
20 order, because that order is what will go into the CABS
21 billing system.

22 On the D order, they would enter in everything
23 that is currently on the Pac Bell record, because the idea
24 of the D order is to take them totally out of the billing
25 system. So they would enter the BTN and any associated
0115
1 lines, and any features that were on the records for that
2 individual BTN.

3 Q. So can this be another screen, or more than one
4 screen worth of information that's being entered for the C
5 order and the D order?

6 A. It depends upon how big the service is. Yes,
7 there could be additional, more than one screen.

8 Q. Is this in addition to what I had understood
9 earlier to be the entry into the SORD screen, do you
10 understand? I had understood -- initially, you talked
11 about there being entries of data into the SORD database.
12 Is that done via these two orders, or is there a SORD

13 database screen that comes out where that data is input

14 initially, and then these two orders have been input?

15 A. No, these are input directly into SORD.

16 Q. Isn't that the extent of what is inputted to

17 SORD?

18 A. Everything in this scenario, with the exception

19 of the Yellow Page and the White Page listing which we

20 have talked about, plus the related indicator, would go in

21 that order that would relate both of these orders, the D

22 to the C and the C to the D.

23 Q. And that relator has existed from the beginning?

24 A. Yes, it has.

25 Q. The issue was, in terms of the loss of dial

0116

1 tone, was that some of the representatives did not use

2 that indicator to ensure that those two orders were all

3 kept together; is that right?

4 A. Yes.

5 Q. So let me make sure I understand. When we talk

6 about the order being typed in SORD for migration, we are

7 talking about two orders being entered, one is the C

8 order, the other is the D order, correct?

9 A. Yes.

10 Q. Are there other types of orders that sometimes

11 are entered for migrating end users, other than the C and

12 the D order?

13 A. No.

14 Q. So after -- when the service representative

15 presses the send button and moves over to the CLEO screen

16 and does the FOC, what happens with the data, to your

17 knowledge? Was it put into the SORD system, where does it

18 go next?

19 A. Through the provisioning systems.

20 Q. Do you know the names of those systems or what

21 they did or what sequence they do it?

22 A. I know the names of some. And no, I don't know

23 the sequence.

24 Q. Can you identify for us the names of the systems

25 that you are aware of?

0117

1 A. Yes. LMOS, L-M-O-S, COSMOS, C-O-S-M-O-S, MARCH,

2 M-A-R-C-H, that's all that I know.

3 Q. Can you describe each briefly, what your

4 understanding is what each of them does?

5 A. No.

6 Q. Do you have any idea of what any of the three of

7 them do?

8 A. No, I don't.

9 Q. And so then a service representative is in the

10 CLEO screen, enters the various information you told us

11 about, sending a FOC, completes that, completes the entry

12 of that information, how is that then sent? Is there

13 again a button that's pushed, or is there some --

14 A. There is a command that they go to a certain

15 field, a specified field on their FOC screen on the

16 terminal and enter the command, and then send that FOC

17 through CLEO, where I described it sits in CLEO in a
18 batch, and waits for the next feed to go out on the NDM to
19 the CLC.

20 Q. And so, when the service representative has
21 concluded that, sending it off to be batched and
22 transmitted to the CLC, what does a service representative
23 do next? Do they do something with the LTD?

24 A. Yes, they will update LTD.

25 Q. How do they do that?

0118

1 A. They toggle switch back to LTD, and they
2 indicate in LTD the date and the time that they sent the
3 FOC to the CLC.

4 Q. That's something that -- does that automatically
5 appear, based on the date and time that it currently is at
6 the time they pull it up, or do they manually input it?

7 A. They manually input it.

8 Q. Is that all they put in, time and date? Is
9 there a PON number that appears automatically? Does
10 anything appear automatically?

11 A. When they go into LTD, they will input the PON,
12 because there's information already on that PON that was
13 printed, put in by the command center, so they have to
14 bring up the correct PON. They go to another screen and
15 they put in the date and, I believe, that the time
16 automatically populates for them.

17 Q. Do they put in the PON and that locates for them
18 the appropriate screen in the LTD database?

19 A. Yes.

20 Q. And then they enter -- you think that the time
21 and date automatically appear then?

22 A. They input the date and the time automatically
23 appears.

24 Q. Do they need to input anything else?

25 A. No, I don't believe so.

0119

1 Q. This commonly is the next step? After doing the
2 FOC, then they go back to LTD?

3 A. Yes.

4 Q. And then what do they do next? Is that all they
5 need to do at the LTD?

6 A. That's all they do with LTD.

7 Q. And then they exit from that screen?

8 A. Yes.

9 Q. What next would happen with this migration order
10 at the LISC?

11 A. The SORD flowing through the provisioning
12 system.

13 Q. At the LISC, what happens? If I am the service
14 representative and I have this package, and it had some
15 paper in it, and I have entered all this information in
16 these various databases, and I have just updated the LTD,
17 what do I do next with that order?

18 A. The service representative would update the
19 front of the package.

20 Q. Manually?

21 A. Yes, to indicate that the FOC has been sent out,
22 and then they will copy the order, both orders, on a laser
23 printer. And they will retrieve those copies, put the
24 copies of the service orders that the service rep typed,
25 along with the original order that came in via the NDM,
0120
1 into the package. And when they updated the front of the
2 package, then they put it into their out bin, into our
3 package, to be picked up and taken back to the command
4 center, where it will be recirculated over to the
5 completion department.

6 Q. And the files in the packages in the out bin,
7 how often are they retrieved, do you know?

8 A. No, I don't know.

9 Q. Is it more than once a day?

10 A. Yes, it is.

11 Q. In this instance, what would happen with this
12 hypothetical migration order when it left the out bin?
13 Where would it go next; you said the completion desk?

14 A. It goes to the command center.

15 Q. What is done there?

16 A. The command center will then have the package
17 taken over to the completion group where the package is
18 filed by completion date.

19 Q. So one of the six or seven people who was
20 working at the command center physically takes possession
21 of that package?

22 A. Yes.

25 Q. It's bigger than this room, I guess?

0122

1 A. Yes, it is.

2 MR. KOLTO-WININGER: 180 people at the LISC.

3 MR. McDONALD: Q. How is it configured? Are

4 there people working within work stations? How is it

5 configured?

6 A. There are people working in work stations.

7 Q. Where is the command center? Is it physically

8 in the center of the LISC space?

9 A. No.

10 Q. And at any one time, there are typically what,

11 six or seven people working in the command center?

12 A. Yes.

13 Q. How many service representatives currently would

14 be operating during a normal workday, between 8:00 and

15 5:00, fulfilling the functions that you described in terms

16 of the SORD and CLEO entry?

17 A. That would vary daily.

18 Q. I think -- did you testify that there are

19 currently about 200 employees in the LISC?

20 A. Uhm-hum.

21 Q. That's right?

22 A. Yes.

23 Q. Of those 200, sounds like six or seven at any

24 given time are devoted to the command center tasks; is

25 that right?

0123

1 A. Yes.

2 Q. How many, just a rough approximation, are
3 devoted to the order entry exercise that you described,
4 with the SORD screen and the CLEO screen?

5 A. I don't know the exact number.

6 Q. More than half of the employees?

7 A. I don't know the exact number.

8 Q. Who would know that?

9 A. Nina Ganoza.

10 Q. Does she have responsibility for personnel
11 generally or --

12 A. She has the order entry people report to her.

13 Q. She is one of the four people who are in the
14 same level as you; is that right?

15 A. Yes.

16 Q. In terms of numbers of individuals who are
17 subordinate to each of the four of you, are all of the 200
18 people -- are all of them subordinate to one of the four
19 of you?

20 A. No.

21 Q. Who else in the chain of command might those 200
22 people report to?

23 A. They report to four of us.

24 Q. Are each one of the 200 people ultimate
25 subordinate to each of the four of you -- to one of the
0124
1 four of you?

2 A. Yes.

3 Q. Do you have rough approximations as to how many

4 of those — 50 for each of the four of you, or is it

5 divided up somehow differently?

6 A. It's different.

7 Q. What is the division?

8 A. I don't know what the numbers are. I can tell

9 you what the categories are. Nina Ganoza has the order

10 processing people. I have the customer care group, which

11 includes the 800 number, the mini-NAC and the CSR groups.

12 Chuck McDonnell has responsibilities for expedites and

13 escalations, and Gracie Gutierrez has responsibility for

14 the command center.

15 MR. KOLTO-WININGER: Is it possible to rough

16 estimate or not?

17 THE WITNESS: No, because I don't know the exact

18 number.

19 MR. McDONALD: Q. I wasn't looking for exact

20 but, for example, if Gracie Gutierrez is responsible only

21 for the command center and at any given time there's six

22 or seven people there, and I don't know how many shifts

23 that you consider to have, are you talking about maybe 20

24 people that she is responsible for?

25 A. No. I'd say it's more like 10.

0125

1 Q. So if she has 10, do you know how many people

2 are subordinate to you? I thought you had said 70

3 earlier.

4 A. 70.

5 Q. And of the other two individuals?